

Law Offices of Tae H. Whang, LLC
Tae Hyun Whang, Esq./TW 9226
185 Bridge Plaza North, Suite 201
Fort Lee, NJ 07024
(201) 461-0300
Attorneys for Bank of Hope

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY (Newark)

-----X
IN RE:

Case No.: 17-25768-JKS

Kee Won Chung,

Chapter 13

Debtor.

Hearing Date: October 26, 2017

-----X

OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN
BY SECURED CREDITOR BANK OF HOPE

Bank of Hope, a secured creditor, by its attorneys, Law Offices of Tae H. Whang, LLC,
objects to the confirmation of the Debtor's Chapter 13 Plan on the following ground(s):

1. Debtor's Plan does not comply with the provisions of United States Code, Title 11, Chapter 13 and with other applicable provisions in that Debtor has provided false information in the petition. Debtor owns commercial real property located at 587 Route 303, Blauvelt, NY 10913 (the "Commercial Property") which is not listed as asset in Debtor's Petition. The Debtor also owns a residential condominium unit located at 100 Old Palisade Road, Unit PL-12, Fort Lee, NJ 07024 (the "Condominium Unit"), but lists \$0.00 as the value of the Condominium. Debtor did not list banks accounts, did not list business interests and lists no income.

2. Debtor's Plan to make payments of \$250 per month is not feasible because Debtor has no income.

3. Debtors Plan does not contain any provision to make payments to secured creditor Bank of Hope.

4. Debtor's Plan does not contain any provision to make payments for real property taxes.

5. Debtor's Plan does not contain any provision to make payments for insurance.

6. Debtor's Plan does not provide secured creditor Bank of Hope with adequate protection. Bank of Hope has mortgages on both the Commercial Property and the Condominium Unit and the Plan does not provide for any adequate protection payments to Bank of Hope.

WHEREFORE, secured creditor Bank of Hope objects to the confirmation of the Chapter 13 Plan and prays that the confirmation of the Chapter 13 Plan be denied.

Dated: October 18, 2017

Law Offices of Tae H. Whang, LLC
Attorneys for Bank of Hope

/s/ Tae Hyun Whang
By: Tae Hyun Whang, Esq. (TW-9226)

Law Offices of Tae H. Whang, LLC
Tae Hyun Whang, Esq./TW 9226
185 Bridge Plaza North, Suite 201
Fort Lee, NJ 07024
(201) 461-0300
Attorneys for Bank of Hope

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY (Newark)

-----X
IN RE:

Case No.: 17-25768-JKS

Kee Won Chung,

Chapter 13

Debtor.

Hearing Date: October 26, 2017

-----X

CERTIFICATE OF MAILING

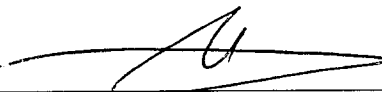
Orcia Kissangoula, being duly sworn, say: I am not a party to this action, am over 18 years of age and reside in Union County, New Jersey.

On October 18, 2017, I served the within OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN BY SECURED CREDITOR BANK OF HOPE by depositing a true copy thereof enclosed in a post-paid wrapper, in an official depository under the exclusive care and custody of the U.S. Postal Service, addressed to each of the persons set forth below at the last known address set forth after each name.

Aileen Perez, Esq.
11 State Street, Second Floor
Hackensack, NJ 07601

Marie-Ann Greenberg, Chapter 13 Trustee
30 Two Bridges Road, Suite 330
Fairfield, NJ 07004

U. S. Trustee
One Newark Center, Suite 2100
Newark, NJ 07102



Orcia Kissangoula

Sworn to before me on the
18th day of October, 2017



Notary Public

Tae Hyun Whang, ESQ

Tae Hyun Whang, ESQ

Attorney At Law

Attorney At Law

State Of New Jersey

State Of New Jersey